

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ANIBAL RODRIGUEZ, SAL
CATALDO, JULIAN
SANTIAGO, and SUSAN LYNN
HARVEY, individually and on behalf of all
others similarly situated,

Plaintiffs,
vs.
GOOGLE LLC,
Defendant.

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Case No.: 3:20-cv-04688-RS

**DECLARATION OF RYAN MCGEE IN
SUPPORT OF PLAINTIFFS'
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL EXHIBIT TO MOTION
TO STRIKE**

Magistrate Judge Alex G. Tse
Courtroom A – 15th Floor
Trial Date: August 18, 2025

DECLARATION OF RYAN MCGEE

I, Ryan McGee, declare as follows.

1. I am an associate with the law firm of Morgan and Morgan, counsel for Plaintiffs in this matter. I am an attorney at law duly licensed to practice before all courts of the State of Florida and admitted *pro hac vice* for this case. Dkt. 13. I have personal knowledge of the matters set forth herein and am competent to testify.

2. Pursuant to Civil Local Rule 79-5, I submit this Declaration in support of Plaintiffs' administrative motion to seal portions of Exhibit 1 to Google's Motion to Strike. In making this request, Plaintiffs have carefully considered the relevant legal standard and policy considerations outlined in Civil Local Rule 79-5.

3. Plaintiffs respectfully request that the Court seal portions of Exhibit 1 to Google's Motion to Strike (previously filed at Dkt. 442-2).

4. The information requested to be sealed is being designated by Plaintiffs as “Confidential” pursuant to the parties’ Stipulated Protective Order (Dkt. 70).

5. Specifically, Plaintiffs request the Court seal Plaintiffs' confidential contact information (addresses and phone numbers).

6. If the Court were to deny sealing this information, Plaintiffs could be subjected to a heightened risk of injury, including identity theft. I was personally involved at all stages of the litigation in *Adkins v. Facebook, Inc.*, No. 3:18-cv-05982-WHA (N.D. Cal.) including expert discovery and related motions practice. I personally presented plaintiffs' tutorial before Judge Alsup with two cybersecurity experts (one of whom served as plaintiffs' testifying expert) to discuss data breaches and exploitation of personal information. No. 3:18-cv-05982-WHA, Dkts. 20, 65.

7. I also personally defended the expert deposition of the testifying cybersecurity expert, and I personally argued the *Daubert* motions that Facebook filed against our experts. The information Plaintiffs seek to seal here is of substantially the same type of information that can be used to gain unauthorized access to personal accounts.

I declare under penalty of perjury under the laws of the United States of America that the

1 foregoing is true and correct. Executed this 10th day of January, 2025, at Tampa, Florida.
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/s/ Ryan J. McGee